

3.4 Cultural and Tribal Cultural Resources

This section describes and evaluates potential impacts related to cultural resources that could result from construction and operation of the Proposed Project. The section contains: (1) a description of the existing setting as it pertains to cultural resources, as well as a description of the Adjusted Baseline Environmental Setting; (2) a summary of the federal, State, and local regulations related to cultural resources; and (3) an analysis of the potential impacts related to cultural resources associated with the implementation of the Proposed Project, as well as identification of potentially feasible measures that could mitigate significant impacts.

Comments received in response to the NOP for the EIR regarding cultural resources can be found in Appendix B. Any applicable issues and concerns regarding potential impacts related to cultural resources that were raised in comments on the NOP are analyzed within this section.

The analysis in this section is based on the *Cultural Resources Assessment Report* prepared by ESA, which is included as Appendix F of this Draft EIR. Additional communication as part of Tribal consultation under Assembly Bill (AB) 52 is also provided in Appendix F.

3.4.1 Environmental Setting

Natural Setting

The Project Site is located within the fully urbanized City of Inglewood. The Project Site is surrounded by residential and commercial development to the west, south, and east, and the former Hollywood Park to the north (currently the Hollywood Park Specific Plan [HPSP] area). The HPSP Adjusted Baseline projects include the NFL Stadium, commercial, office, residential, civic, and open space uses. Prior to the development of the area, historic topographic maps dating to the 1920s and 1930s indicate a north-south-trending ephemeral drainage originating north from the Baldwin Hills and ending just north of the Project Site's northern boundary. The drainage was eventually impacted by the development of Hollywood Park in the 1940s.

Geological Setting

The Project Site is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province.¹ The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18 million to 3 million years ago (Ma).² While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the

¹ Ingersoll, R. V. and P. E. Rumelhart. 1999. Three-stage basin evolution of the Los Angeles basin, southern California. *Geology* 27: 593–596.

² Critelli, S. P. Rumelhart, and R. Ingersoll, 1995. Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, southern California: implications for rapid uplift and accumulation rates. *Journal of Sedimentary Research* A65: 656–667.

middle Miocene (around 13 Ma).³ Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation.⁴ Most of these sediments are marine, as they eroded from surrounding marine formations, until sea level dropped in the Pleistocene Era and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the Project Site occurring in the Central Block, where sediments range from 32,000 to 35,000 feet thick.⁵ The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across.⁶

Prehistoric Setting

Based on recent research in the region,⁷ the following prehistoric chronology has been divided into four general time periods: the Paleocoastal Period (12,000 to 8,000 Before Present [B.P.]), the Millingstone Period (8,000 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to the time of Spanish Contact in A.D. 1542).

Paleocoastal Period (12,000–8,000 B.P.)

While it is not certain when humans first came to California, their presence in Southern California by about 11,000 B.P. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P.⁸ During this time period, the climate of Southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.⁹

Millingstone Period (8,000–3,000 B.P.)

During the Millingstone period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first definitive evidence of human occupation in the

³ Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder. 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁴ Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder. 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁵ Yerkes, R.F., T.H. McCulloh, J.E. Schollhamer, and J.G. Vedder, 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁶ Yerkes, R.F., T.H. McCulloh, J.E. Schollhamer, and J.G. Vedder, 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁷ Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors), 2014. Paleoenvironment and Culture History. In *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California, Volume 1*, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California.

⁸ Byrd, Brian F., and L. Mark Raab, 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215–227.

⁹ Byrd, Brian F., and L. Mark Raab, 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215–227.

Los Angeles area dates to at least 8,000 years B.P. and is associated with the Millingstone cultures.^{10,11}

Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals.¹²⁻¹³ Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Intermediate Period (3,000–1,000 B.P.)

During the Intermediate period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.^{14,15,16} The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.¹⁷ Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.¹⁸

This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and non-utilitarian materials, and extensive travel routes. Although the intensity of trade had already been increasing, it now reached its zenith, with asphaltum (tar), seashells, and steatite being traded from Southern California to the Great Basin. Use of the bow and arrow spread to the coast around 1,500 B.P, largely replacing the dart and atlatl.¹⁹ Increasing population

¹⁰ Wallace, W.J., 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230.

¹¹ Warren, C.N., 1968. Cultural Traditions and Ecological Adaptation on the Southern California Coast. *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams. Eastern New Mexico University Contributions in Anthropology 1(3):1–14.

¹² Byrd, Brian F., and L. Mark Raab, 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215–227.

¹³ Wallace, W.J., 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230.

¹⁴ Erlandson, Jon M., 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

¹⁵ Wallace, W.J., 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230.

¹⁶ Warren, C.N., 1968. Cultural Traditions and Ecological Adaptation on the Southern California Coast. *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams. Eastern New Mexico University Contributions in Anthropology 1(3):1–14.

¹⁷ Erlandson, Jon M., 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

¹⁸ Byrd, Brian F., and L. Mark Raab, 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215–227.

¹⁹ Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors), 2014. *Paleoenvironment and Culture History*. In *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California*, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California.

densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 B.P.²⁰

Late Period (1,000 B.P.–A.D. 1542)

The Late Period is associated with the florescence of the people who later became known as the “Gabrielino,”²¹ and who are estimated to have had a population numbering around 5,000 in the pre-contact period. The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente.²² This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record.^{23,24} Settlement at this time is believed to have consisted of dispersed family groups that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources.

Ethnographic Setting

Protohistoric Period (A.D. 1542 to 1771)

The Project Site is located in a region traditionally occupied by the Gabrielino Indians. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence.²⁵ The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

At the time of Spanish contact in A.D. 1542, also the beginning of what is known as the Protohistoric Period (A.D. 1542 to 1771), many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich.²⁶ This religion may have been relatively new when the Spanish arrived, and at that time was spreading to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation of their dead. A wide variety of grave

²⁰ Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko, 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. *Pacific Coast Archaeological Society Quarterly* 31(3):3–27.

²¹ The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina. Some modern Tribes use alternative spellings.

²² Kroeber, A.L., 1925. *Handbook of the Indians of California*. Dover Publications, Inc., New York, reprinted 1976.

²³ Erlandson, Jon M., 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

²⁴ Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko, 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. *Pacific Coast Archaeological Society Quarterly* 31(3):3–27.

²⁵ Bean, L.J., and C.R. Smith, 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

²⁶ Bean, L.J., and C.R. Smith, 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory.²⁷ Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

Historic Setting

Spanish Period (A.D. 1769–1821)

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained contact with Europeans did not commence until the onset of the Spanish Period. In 1769 Gaspar de Portolá led an expedition from San Diego, passing through the Los Angeles Basin and the San Fernando Valley, on its way to the San Francisco Bay.²⁸ Father Juan Crespi, who accompanied the 1769 expedition, noted the suitability of the Los Angeles area for supporting a large settlement. This was followed in 1776 by the expedition of Father Francisco Garcés.²⁹

In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples as well as exposing them to diseases that they had no resistance to. Mission San Gabriel Arcángel was founded on September 8, 1771, and Mission San Fernando Rey de España on September 8, 1797. By the early 1800s, the majority of the surviving Gabrielino had entered the mission system, either at San Gabriel or San Fernando. Mission life offered some degree of security in a time when traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing. This lifestyle change also brought with it significant negative consequences for Gabrielino health and cultural integrity.

A Gabrielino village, or “rancheria,” known as Guaspét, or Guasna or Gaucha, appears to have been located northwest of the Project Site. Based on mission baptism records, the rancheria appears to have been occupied from about 1790 to 1820.³⁰ At least 193 people are known to have lived at the rancheria and been baptized. Records suggest that recruitment into the mission system did not occur until native populations in closer proximity to Mission San Gabriel had been

²⁷ Bean, L.J., and C.R. Smith, 1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538–549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

²⁸ McCawley, William, 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum Press, Banning, California.

²⁹ Johnson, J.R., and D.D. Earle. 1990. Tataviam Geography and Ethnohistory. Journal of California and Great Basin Anthropology, 12(2):191-214.

³⁰ Reedy, Seetha N., 2015. Feeding Family and Ancestors: Persistence of Traditional Native American Lifeways during the Mission Period in Coastal Southern California. Journal of Anthropological Archaeology, No. 37, pp. 48-66.

assimilated, and after grazing expanded into the Project Site vicinity, bringing native inhabitants of the region into closer contact with Spanish-era ranchers.³¹

A 1937 map titled *The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.-1937 A.D.* (Kirkman map) depicts approximate locations of Gabrielino villages in Los Angeles. It depicts the location of unnamed villages about 2 to 5 miles north of the Project Site but does not show any roads, landforms, or locations overlapping with the Project Site.

Mexican Period (A.D. 1821-1848)

After Mexico gained its independence from Spain in 1821, Los Angeles became the capital of the California territory in 1835.³² Mexico continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the California missions, reclaiming the majority of mission lands and redistributing them as land grants throughout California. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.³³ Because of the disbursement that the Gabrielino populations suffered during the Mission period no land was returned to the Gabrielino Tribes.

During the Mexican Period many ranchos continued to be used by settlers for cattle grazing. Hides and tallow from cattle became a major export for Mexican settlers in California, known as Californios, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros and Indian laborers.^{34,35}

American Period (A.D. 1848-present)

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hidalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized the right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership.³⁶

When the discovery of gold in northern California was announced in 1848, an influx of people from other parts of North America flooded into California and the population of Los Angeles

³¹ Stoll, Anne Q., John G. Douglass, and Richard Ciolek-Torrello, 2009. Searching for Guaspet: A Mission Period Rancheria in West Los Angeles. SCA Proceedings, Vol. 22.

³² Gumprecht, Blake, 2001. Los Angeles River: Its Life, and Possible Rebirth. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

³³ Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz, 2009. Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.

³⁴ Pitt, Leonard, 1994. The Decline of the Californios: A Social History of the Spanish-speaking Californians, 1846-1890. University of California Press, Berkeley.

³⁵ Starr, Kevin, 2007. California: A History. Modern Library, New York.

³⁶ Starr, Kevin, 2007. California: A History. Modern Library, New York.

tripled between 1850 and 1860. The increased population led to additional demand of the Californios' cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts.^{37,38} These natural disasters, coupled with the burden of proving ownership, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.^{39,40}

History of Inglewood

During the rancho period, the City of Inglewood was part of the *Rancho Aguaje de la Centinela* and the *Rancho Sausal Redondo*. A year after Mexico gained independence from Spain and control of California in 1822, Los Angeles resident Antonio Avila received a land grant for *Rancho Sausal Redondo* and grazed cattle there as well. The rancho encompassed the areas that are now the Cities of Redondo Beach, Inglewood, Hawthorne, El Segundo, Lawndale, Manhattan Beach and Hermosa Beach. In 1834 Ygnacio Machado, one of the original leather jacket soldiers that escorted settlers to Los Angeles, built the Centinela Adobe. The Centinela Adobe, located approximately 2.5 miles from the Project Site, was in the center of what became a 2,200-acre ranch on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, which was granted to him as the *Rancho Aguaje de la Centinela*. Soon after Machado traded the *Rancho Aguaje de la Centinela* for a keg of whiskey and a home in the Pueblo of Los Angeles. The property traded hands many times and was eventually acquired by a Scottish noble man named Robert Burnette who eventually added the much larger *Rancho Sausal Redondo* to his holdings, once again combining the ranchos. Burnette eventually returned to Scotland and leased the ranch to a Canadian immigrant who was considered by many to be the founding father of Inglewood: Daniel Freeman. In spite of drought and other hardship Freeman successfully farmed barley on the ranch, and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood.⁴¹

Centinela Springs (California Historical Landmark 363), or *Aguaje de Centinela*, was a valued source of spring water for the *Rancho Aguaje de la Centinela* and the spring is described as continuously existing since the Pleistocene Era. The spring is memorialized and is still located at the corner of Centinela Avenue and Florence Boulevard, approximately 2 miles north of the Project Site in the City of Inglewood.⁴²

Excursion trains from Los Angeles brought many prospective land buyers to Inglewood and it was able to grow to 300 residents by 1888. On May 21, 1888, a school opened with 33 students.

³⁷ McWilliams, Carey, 1946. *Southern California: An Island on the Land*. Gibbs Smith, Layton, Utah.

³⁸ Dinkelspiel, Frances, 2008. *Towers of Gold*. St. Martin's Press, New York.

³⁹ Gumprecht, Blake, 2001. *Los Angeles River: Its Life, and Possible Rebirth*. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

⁴⁰ McWilliams, Carey, 1946. *Southern California: An Island on the Land*. Gibbs Smith, Layton, Utah.

⁴¹ Kielbasa, John, 1998. *Historic Adobes of Los Angeles County*. Dorrance Publishing Co. Pittsburg, Pennsylvania.

⁴² Office of Historic Preservation, 2019. <http://ohp.parks.ca.gov/ListedResources/Detail/363>. Accessed January 9, 2019.

Around this time, businesses, including Mrs. Belden’s Boarding House, two grocery stores, a drug store, a planning mill, a wagon repair shop, a plumbing shop, a livery stable, and five real estate offices, were built on Commercial Street (now La Brea).⁴³ With a population of about 1,200, Inglewood was incorporated on February 10, 1908. That same year, the high school building was completed.⁴⁴

On the evening of June 21, 1920, a large earthquake struck Inglewood. While there was a lot of damage to buildings, there was no loss of life. The next few days saw a large number of tourists coming to Inglewood to view the damage. The climate impressed the visitors who had previously never been to Inglewood, and as a result, many settled there. The population grew to 3,286 in 1920, and in the next two years, the population doubled, making Inglewood the fastest growing city in the nation at that time.⁴⁵

The 1932 Olympic Games were held in Los Angeles, and three Inglewood High School alumni won medals. Many buildings in Inglewood were used as training facilities, and the marathon route went through the town.⁴⁶ Until World War II, Inglewood had largely been supported by agricultural industry. The defense industries, in response to WWII, transformed Inglewood into an urban community when industrial activities brought more people to live in the city. In 1946, major airlines moved operations to the LAX airport and two new hangars needed to be constructed.⁴⁷ In 1949, the airport was designated as an intercontinental air terminal by the federal government.⁴⁸

In 1967, The Forum was opened as the home of the Los Angeles Lakers of the National Basketball Association and Los Angeles Kings of the National Hockey League. It also hosted a number of events such as concerts, rodeos, boxing, the circus, and ice shows.⁴⁹ The Forum is located approximately 1 mile north of the Project Site, near the intersection of South Prairie Avenue and Manchester Boulevard. The Forum underwent a rehabilitation, was listed on the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register), and reopened in 2014. Additionally, at that time, The Forum underwent an adaptation from an arena primarily designed for sporting events to an arena primarily used for music and entertainment events.

In the 1970s, a new health center was built on Manchester, north of the Project Site, and high-rise office buildings were constructed on La Brea, to the northwest of the Project Site.⁵⁰ A new civic center was dedicated in 1973. Airport Park View Hotel opened between Hollywood Park Race

⁴³ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁴ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁵ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁶ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁷ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁸ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁹ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁵⁰ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

Track and The Forum.⁵¹ Many senior housing developments were also built in Inglewood during the 1970s.

More recent developments include the closure of the Hollywood Park Race Track, in 2013, located adjacent and to the north of the Project Site, and demolition of the track in 2016. In 2015, a new NFL stadium was approved and is currently under construction on the site of the former race track, and a new Hollywood Park Casino was opened next door.

Architectural Themes

The following themes were developed to provide a context for evaluation of the existing buildings on the Project Site and their potential to qualify as historical resources: Hotels and Motels, and Apartment Hotels.

Hotels and Motels

In early America, lodging for travelers typically took the form of the public house or tavern, establishments that were granted licenses to serve alcohol in exchange for offering public lodging.⁵² Following the Revolution and the War of 1812, a new generation of American hotels emerged, with a boom in hotel construction from about 1820 to 1830. By 1840, the hotel was ubiquitous across the eastern half of the United States.⁵³ The first hotel in the City of Los Angeles was the Bella Union, built on Main Street in downtown Los Angeles in 1835. The Bella Union was typical of mid-19th century hotels in Los Angeles, which tended to be small operations in modest buildings. After the Civil War, larger and more luxurious hotels began to appear in downtown Los Angeles, including the Pico House Hotel built in 1864, and the Hotel Nadeau, which opened in 1882.⁵⁴

At the end of the 19th century, American tourism began to expand rapidly as a result of increased leisure time and the availability of long-distance transportation in the form of the railroad. By the first decades of the 20th century, Los Angeles was experiencing tremendous growth. In the first thirty years of the century, the population of Los Angeles grew from 100,000 to 1,000,000, surpassing San Francisco as the largest city in the state. In accordance with this impressive growth, Los Angeles moved away from its humble pueblo beginnings as the commercial core shifted south to the new major thoroughfares of Main, Spring, Broadway, Hill, and Olive streets. Major hotels in early 20th century Los Angeles included the Alexandria Hotel (1906), the Rosslyn Hotel (1914), and the Biltmore Hotel (1923).

The early 20th century also marked the beginning of a business model that would come to dominate the hotel industry by the postwar period: the chain hotel. Rather than catering to an elite class looking for luxurious accommodation, the chain hotels of the 20th century focused on

⁵¹ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁵² Sandoval-Strausz, A.K., 2007. *Hotel: An American History*. New haven: Yale University Press.

⁵³ Sandoval-Strausz, A.K., 2007. *Hotel: An American History*. New haven: Yale University Press.

⁵⁴ Wallach, Ruth, Linda McCann, Dave Taube, Claude Zachary, and Curtis C. Roseman, 2008. *Historic Hotels of Los Angeles and Hollywood*. Images of America. California.

appealing to the masses. The rising importance of the automobile had a profound influence on the American hotel. Initially, car owners abandoned the hotel for “autocamping,” but the rise of the new motor hotel, or motel, offered the highway traveler a hotel experience along the roadside, often far from urban centers. By about 1940, motels outnumbered hotels in the United States and became the dominant form of lodging for the American traveler during the postwar years.⁵⁵

The middle of the 20th century also saw the rise of the hotel chain. Among the largest and most successful American hotel chains were Holiday Inn, Hilton, and Sheraton. Conrad Hilton entered the hotel business in Texas in 1919 and opened the first Hilton in Dallas in 1925. His company expanded across the nation and in 1943 Hilton became the first coast-to-coast hotel chain. Many smaller hotel chains also emerged during the postwar years. The Doric Company was a relatively small operator of hotels and motels in the western United States during this period. In 1963, operations included eight hotels or motels in Washington State, one in Oregon, three in Idaho, and eight in California. In contrast, while Holiday Inn had humble beginnings in the motor hotel sector it grew into a successful hotel chain in the second half of the 20th century.

Apartment Hotels

Apartment hotels are structures that provide a room or a suite of rooms, which include facilities for food preparation as well as amenities found in standard hotels such as traditional common spaces and housekeeping services. Buildings that were advertised as apartment hotels began to be built prior to World War I. Most of these structures were large, with around 100 units per building. They were fully furnished and usually located in central business districts.⁵⁶ The construction of apartment hotels tapered after the Great Depression and did not resume again after World War II because they were not well suited to the automobile. Their function was replaced with motels with kitchenettes after World War II.

3.4.2 Adjusted Baseline Environmental Setting

Section 3.4, Cultural and Tribal Cultural Resources, assumes the Adjusted Baseline Environmental Setting as described in Section 3.0, Introduction to the Analysis. Related to Cultural Resources, the changes associated with the HPSP Adjusted Baseline projects include excavation in the HPSP area and construction of new uses on the HPSP site.

There is no evidence that development in the HPSP area would affect the baseline for analysis of the archaeological or Tribal resources. No archaeological or Tribal resources have been discovered and documented during construction of the HPSP Adjusted Baseline projects that would provide additional information on the presence or sensitivity of these resources in the area. In addition, The Forum, which is listed on the National Register and the California Register, is currently visible from the Project Site, and these views will be obscured as a result of baseline

⁵⁵ Sandoval-Strausz, A.K., 2007. *Hotel: An American History*. New haven: Yale University Press.

⁵⁶ SurveyLA, 2017. *Los Angeles Citywide Historic Context Statement, Hotels, 1870-1980*. City of Los Angeles.

development in the HPSP area altering the baseline conditions with regards to architectural resources. This is considered as part of the impact analysis below.

3.4.3 Regulatory Setting

Numerous laws and regulations require state and local agencies to consider the effects a project may have on cultural resources. These laws and regulations define important cultural resources, stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies.

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at Public Resources Code (PRC) section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (PRC section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The *CEQA Guidelines* (Title 14 California Code of Regulations [CCR] section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register; (2) a resource included in a local register of historical resources, as defined in PRC section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of CEQA section 21084.1 and CEQA Guidelines section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of section 21083, which is as a unique archaeological resource. As defined in PRC section 21083.2, a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;

- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Pursuant to PRC section 21083.2, if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (PRC section 21083.1(a)). If preservation in place is not feasible, mitigation measures are required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CEQA Guidelines section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired” (CEQA Guidelines section 15064.5(b)(1)). According to CEQA Guidelines section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of PRC section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

In general, a project that complies with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Standards)⁵⁷ is considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines section 15064.5(b)(3)).

California Register of Historical Resources

The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State

⁵⁷ Weeks, Kay D., and Anne E. Grimmer, 1995. *The Secretary for the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstruction Historic Buildings*. U.S. Department of the Interior. Washington, D.C.

and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC section 5024.1(a)). The criteria for eligibility for the California Register are based upon National Register criteria (PRC section 5024.1(b)). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

Public Resources Code Section 5097.98

PRC section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery until certain required steps have been taken, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. The MLD has 48 hours from the time of being granted access to the site by the landowner to inspect the discovery and provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

California Health and Safety Code Section 7050.5

California Health and Safety Code section 7050.5 requires that in the event human remains are discovered, the County Coroner is required to be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

Assembly Bill 52 and Related Public Resources Code Sections

AB 52 was approved by Governor Brown on September 25, 2014. The act amended PRC section 5097.94, and added PRC sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a NOP or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) is filed.

The primary intent of AB 52 is to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans, known as Tribal cultural resources, that require consideration under CEQA. PRC section 21074(a)(1) and (2) defines Tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American [T]ribe” that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a Tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. On July 30, 2016, the California Natural Resources Agency adopted the final text for Tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

PRC section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a Tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC section 21073) and who have requested in writing to be informed by the lead agency (PRC section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the Tribe's request for consultation (PRC sections 21080.3.1(d) and 21080.3.1(e)).

PRC section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of Tribal cultural resources; the significance of the project's impacts on the Tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a Tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC section 21080.3.2(b)).

If a California Native American Tribe has requested consultation pursuant to PRC section 21080.3.1 and does not provide comments to the lead agency, or otherwise does not engage in the consultation process, or if the lead agency has complied with section 21080.3.1(d) and the California Native American Tribe has not requested consultation within 30 days, then the lead agency may certify an EIR or adopt an MND (PRC section 21082.3(d)(2) and (3)).

PRC section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the Tribal cultural resources, that is submitted by a California Native American Tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the Tribe that provided the information. If the lead agency publishes any information submitted by a California Native American Tribe during the consultation or environmental review process, then that information shall be published in a confidential appendix to the environmental document unless the Tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Senate Bill 18

Senate Bill 18 (SB 18) (Statutes of 2004, Chapter 905), which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American Tribes before making certain planning decisions and to provide notice to Tribes at certain key points in the planning process. The intent is to "provide California Native American [T]ribes an opportunity to

participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”⁵⁸

The purpose of involving Tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level, land use designations are made by a local government. The consultation requirements of SB 18 apply to general plan or specific plan processes proposed on or after March 1, 2005.

According to the *Tribal Consultation Guidelines: Supplement to General Plan Guidelines*,⁵⁹ the following are the contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate Tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government’s jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the Tribe (Government Code section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those Tribes that are on the NAHC contact list and have traditional lands located within the city or county’s jurisdiction. The referral must allow a 45-day comment period (Government Code section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to Tribes who have filed a written request for such notice (Government Code section 65092).

Local

The City of Inglewood’s General Plan does not identify any goals or policies related specifically to cultural or Tribal resources.

3.4.4 Analysis, Impacts and Mitigation

Significance Criteria

The City has not adopted thresholds of significance for the analysis of impacts to cultural resources. The following thresholds of significance are consistent with CEQA Guidelines Appendix G. A significant impact would occur if the Proposed Project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5;

⁵⁸ Governor’s Office of Planning and Research, 2005. State of California Tribal Consultation Guidelines. Sacramento, California.

⁵⁹ Governor’s Office of Planning and Research, 2005. State of California Tribal Consultation Guidelines. Sacramento, California.

2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5;
3. Disturb any human remains, including those interred outside of dedicated cemeteries; or
4. Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); and
 - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Methodology and Assumptions

Historic Architectural Resources

The analysis of impacts to historic architectural resources is based on the *Cultural Resources Assessment Report* (Appendix F) prepared by qualified personnel who meet or exceed the Secretary of the Interior’s Professional Qualification Standards in history and architectural history. Key steps in completing the assessment included a survey of historic-age building within the Project Site, archival research, and field documentation. Research into the Project Site’s development history included a review of historic permits for improvements to the property, historic photographs, aerial photographs, and local histories. The California State Historic Resources Inventory for Los Angeles County, records housed at the California Historic Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC), was consulted to identify any previous evaluations of potential historic resources on, or immediately adjacent to, the Project Site. The only National or California Register-listed architectural historical resource within 1 mile of the Project Site is The Forum. Sanborn Fire Insurance maps were not available for the area.

Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or the immediate surroundings contain, any historic resources that may be impacted by the Project; and, if any such resources exist, (2) a determination of whether the Project would result in a “substantial adverse change” to the significance of any such resources.

Archaeological Resources

The analysis of impacts to archaeological resources is also based on the *Cultural Resources Assessment Report*, which included: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within 0.5-mile radius of Project Site, as well

as a review of cultural resource reports and historic topographic maps on file; (2) a review of the California Points of Historical Interest, the California Historical Landmarks, the California Register, the National Register, and the California State HRI listings; (3) a Sacred Lands File (SLF) search commissioned through the NAHC; (4) a review of available Sanborn Maps, historic aerial imagery; and other technical studies; and (5) a pedestrian survey of the Project Site.

The potential for the Project Site to contain buried archaeological resources is assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources) and SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters (maximum depth of 35 feet below ground surface) for the Proposed Project.

Tribal Cultural Resources

The analysis of impacts to Tribal cultural resources is based on the consultation between the City and the responding Tribe, information provided by the Tribe, and the *Cultural Resources Assessment Report*. The potential for the Project Site to contain Tribal cultural resources was assessed based on information provided by Tribes and supplemented by the findings of the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Proposed Project. The NAHC was contacted on April 24, 2018, to request a search of the SLF of the Project Site (see Appendix F).

Human Remains

The analysis of impacts to human remains is based on the *Cultural Resources Assessment Report*. The potential for the Project Site to contain human remains was assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Proposed Project.

Cultural Resources Archival Research

A records search for the Proposed Project was conducted on May 7, 2018, by ESA staff at the CHRIS-SCCIC housed at California State University, Fullerton. The records search included a review of all recorded archaeological resources and previous studies within the Project Site and a 0.5-mile radius of the Project Site, and historic architectural resources within or adjacent to the Project Site.

Previous Cultural Resources Investigations

The records search results indicate that four cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Of the four previous studies, two studies (LA-10567 and 11150) were performed in areas that are adjacent to the Project Site along West Century Boulevard. None of the study areas overlaps with the Project Site. LA-10567 is a linear survey report that covers several communities for a pipeline alignment, and LA-11150 is a memorandum from the Office of Historic Preservation regarding the section 106 process for the same project.

Previously Recorded Cultural Resources

The records search results indicate that no archaeological resources have been previously recorded within the Project Site or the 0.5-mile records search radius. The records search also indicated that no historical architectural resources have been previously recorded within or adjacent to the Project Site. The Forum is located approximately 1 mile north of the Project Site and is listed on the National Register and the California Register; it is the only National Register or California Register-listed property within 1 mile of the Project Site. There are no California Landmarks within 1 mile of the Project Site.

Sacred Lands File Search

The NAHC maintains a confidential SLF which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on April 24, 2018, to request a search of the SLF. On April 25, 2018, the NAHC responded that there was no record of sacred lands in the SLF for the Project Site.⁶⁰

Geoarchaeological Review

A geoarchaeological review was performed to characterize the geology of the Project Site and assess the potential for the presence of subsurface archaeological resources in the Project Site. The review included study of the geological mapping of the Project Site and vicinity, historic topographic maps, historic aerial photographs, mapped soils, and a review of the geotechnical data for the site. The Project Site is located on the alluvial Torrance Plan and is situated approximately 0.18 miles southwest of the Potrero Fault Zone and 1.13 miles southeast of the Newport-Inglewood Fault Zone. Elevation within the Project Site ranges between 87 and 106 feet above mean sea level and slopes towards the south and west. Presently, the majority of the Project Site is previously disturbed, and previously contained residences but is currently vacant land with the exception of commercial properties including a motel, manufacturing, and warehouse land uses, utilities, and paved roads and parking. In addition, the Arena Site includes a parcel containing an existing City water supply well and associated infrastructure.

Geologically, the Project Site is situated within the West Coast Basin portion of the greater Los Angeles Basin, a broad trough formed by tectonic activity and stream erosion of nearby mountains, and filled with Quaternary-aged terrestrial and shallow marine sediments overlying Tertiary-aged marine sediments. Older geological mapping⁶¹ depicts shallow sediments underlying the Project Site as Pleistocene-aged Lakewood Formation sand, silt, silty sand, and silty clay with occasional gravel lenses. Jennings⁶² identifies sediments beneath the Project Site

⁶⁰ Totton, Gayle, 2018. SLF Search Results for the Clippers Arena Project. On file at ESA.

⁶¹ California Department of Water Resources, 1961. Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County. Bulletin 104.

⁶² Jennings, C.W., 1962. Long Beach Sheet, Geologic Map of California: California Division of Mines and Geology, scale 1:250,000.

as river terrace deposits. Recent maps by Dibblee and Minch⁶³ and Saucedo et al.⁶⁴ are generally consistent with earlier maps in identifying Pleistocene-aged alluvium beneath the Project Site; however, these maps additionally identify a small area of Late Pleistocene to Holocene alluvial sediment in the vicinity of South Doty Avenue. A review of historic topographic maps (1923, 1924, and 1930) and aerial photos (1923 and 1928)⁶⁵ shows an intermittent stream flowing from north to south across the Project Site suggesting a source of the sediment. As a result of the construction of the Hollywood Park racetrack in 1938, the stream is no longer evident on maps and aerial photographs.

Historic Maps and Aerial Photographs

The available historic maps and aerial photographs indicate that the vicinity of the Project Site was largely rural until the early 1920s. An aerial image of the area from 1923 shows a mixture of residential development and agricultural properties. In 1928, the area remained sparsely developed but the agricultural properties appear uncultivated or developed with residential buildings. Between 1928 and 1963, the area became nearly fully developed with single- and multi-family residences, while the properties in the Project Site along West Century Boulevard and South Prairie Avenue transitioned from residential to commercial use. Between 1952 and 1963 many of the single family residences and lower density multi-family residences east of South Prairie Avenue were replaced with apartment buildings, hotels and commercial buildings that took up most of any given parcel with zero or minimal lot line setbacks. By 1972, the majority of the parcels on and around the Project Site west of South Prairie Avenue remained smaller, single-family homes; however, the area east of South Prairie Avenue appears to be dominated by apartment buildings with some commercial and single family homes present. This level and type of development appears to have remained consistent according to the 1972 and 1980 aerials. By 2003, large portions of land were vacant on the north side of West 102nd Street in the project area on either side of South Prairie Avenue.

Building permit information obtained from the City of Inglewood's Building Safety Division provide a history of ownership and construction within the Project Site for the two parcels (3940 West Century Boulevard and 10212 South Prairie Avenue) containing historic age buildings. The history and status of these buildings are described in the *Cultural Resources Assessment Report* in Appendix F.

Pedestrian Survey

ESA archaeologists and historians conducted an intensive survey of the entire Project Site for historic, and archaeological resources. The surveys were aimed at identifying historic architectural resources and archaeological, resources within the Project Site. Areas with visible ground surface were subject to pedestrian survey using transect intervals spaced no more than 10 meters (approximately 30 feet) apart. Existing on-site buildings and structures, as well as the

⁶³ Dibblee, T.W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

⁶⁴ Saucedo, G.J., H.G. Greene, M.P. Kennedy, and S.P. Bezore, 2016. Geologic Map of the Long Beach 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series, 1:100,000 Scale.

⁶⁵ Historicaerials.com, 2018. *Historic Aerials*. Electronic database accessed October 25, 2018.

immediate surroundings, were photographed. Due to the fully urbanized nature of the area surrounding the Project Site the possibility of impacts to off-site architectural historical resources diminished greatly as distance from the Project Site increased. Additionally, South Prairie Avenue and West Century Boulevard are wide, four-lane roads that provide additional buffer between the Project Site and the areas to the west and north.

The Project Site is comprised of four discontinuous areas as described in Chapter 2, Project Description, of this EIR. All but six parcels (4032-001-039 and -049; 4032-007-035; and 4032-008-002, -006, and -035) that make up the Project Site are currently vacant or undeveloped. The developed six parcels are all within the Arena Site. The northern portion of the Arena Site currently contains buildings within its northwestern and south-central portions, and vacant/undeveloped land in its eastern half. The undeveloped portions of the Project Site were subject to pedestrian survey and contain low-lying non-native grasses, which obscured ground surface resulting in ground surface visibility ranging from 30 to 70 percent. All undeveloped parcels on the Project Site contained modern building debris including plastic, glass, metal, ceramic, cement, and brick fragments. One historic-period isolate, a clear-glass beverage bottle (EAN-1), and one abalone shell fragment (WSN-1), were identified as a result of the survey.

Two historic-age architectural resources were identified on the Project Site as a result of the survey; the former Turf and Sky Motel (currently the Rodeway Inn & Suites motel), located at 3940 West Century Boulevard within the northwest portion of Arena Site, and a commercial building (currently Let's Have a Cart Party) located at 10212 South Prairie Avenue, within the southern portion of the Arena Site. Also, two historic-age architectural resources were identified within the Alternate Prairie Access Variant; 10204 South Prairie Avenue and 10226 South Prairie Avenue. Detailed descriptions and significance evaluations of these resources are provided in the *Cultural Resources Assessment Report* included as Appendix F of this Draft EIR.

Impacts and Mitigation Measures

Impact 3.4-1: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5. (Less Than Significant with Mitigation)

Historic Architectural Resources

As discussed in the *Cultural Resources Assessment Report* (Appendix F), the Rodeway Inn & Suites (formerly the Turf and Sky Motel) located at 3940 West Century Boulevard, and other buildings at 10212 South Prairie Avenue are the only extant, historic-age buildings on the Project Site. Both of these buildings were constructed more than 45 years ago, meaning they meet the general age requirement to qualify as potential historical resources. As such, the buildings were evaluated for eligibility for listing under the National and California registers.

The Rodeway Inn & Suites at 3940 West Century Boulevard (4032-001-049) was evaluated against the following theme: Hotels and Motels. The Rodeway Inn & Suites is a two-story hotel designed in a contemporary and modest interpretation of the Spanish Colonial Revival style. The hotel was originally constructed in 1955 and has an “O” shaped footprint with a rectangular

courtyard situated in the middle that includes a driveway providing access to the surface parking lot at the rear of the property. The hotel building is oriented toward the north with horizontal massing. It is clad in stucco and has a mansard roof with clay tiles. The hotel is set back from the road behind an asphalt parking lot. Planters are located on the east and west sides of the parking lot with mature palm trees and shrubbery. There is also a planter centered on the front property line and flanked by two driveways. There is a concrete wall present at the side (east and west) and rear (south) property lines.

The other existing, historic-age building on the Project Site is at 10212 South Prairie Avenue (4032-008-035), which is not associated with an established theme. 10212 South Prairie Avenue includes a commercial building that abuts the west property line and one smaller accessory building. The primary (west) façade of the main building faces South Prairie Avenue. It is rectangular in plan and does not represent a particular architectural style. It has a flat roof with a mansard parapet covered in Spanish-style roof tiles. The primary façade is symmetrical and features a pair of glazed, metal-frame doors flanked by two large plate glass windows. This façade is clad in stucco and large rocks while the secondary facades are clad only in stucco. One smaller accessory building, which is noted on one building permit application as a detached garage, is located along the east property line. This building is clad in stucco and has a hipped roof with shallow eaves and composite shingles.

The historic-age buildings were evaluated using the criteria for the National and California registers. The buildings at 3490 West Century Boulevard, 10212 South Prairie Avenue, 10204 South Prairie Avenue, and 10226 South Prairie Avenue are not considered eligible for listing in the National or California registers, because they were not found to be significant under any of the four eligibility criteria. As such, they do not meet the definition of historical resources as outlined in CEQA Guidelines section 15064.5(a)(1) or (2), and the Proposed Project would not have an impact on historical resources. Accordingly, no further analysis of impacts on Project Site historic architectural resources qualifying as historical resources is required pursuant to CEQA.

Archaeological Resources

As a result of the archival research and archaeological resources survey, two archaeological resources consisting of one historic-period isolate (EAN-1) and one shell isolate of undetermined age (WSN-1) were identified within the Project Site. Due to their isolate nature and lack of clear cultural context, EAN-1 and WSN-1 are not eligible for listing in the California Register and do not otherwise qualify as historical or unique archaeological resources pursuant to CEQA.

Based on previous geological and geotechnical work, the Project Site is likely to contain alluvial sedimentary deposits dating to the Late Pleistocene and Holocene. These deposits are expected to be most prevalent in the vicinity of South Doty Avenue between the northern portion of the Arena Site and East Transportation and Hotel Site, which formerly contained a channel drainage. Based on age and environment, these middle/late Holocene sediments are considered more sensitive for buried, intact cultural resources than areas to the east and west, which are underlain by older

alluvium. The older alluvial unit has low sensitivity to contain buried cultural resources because these landforms have remained relatively stable through the Holocene; if cultural remains had been left behind they would have tended to remain at or near ground surface, and subject to decay or other destructive forces, including from the extensive disturbance at the Project Site.

The entirety of the Project Site has been disturbed, including: historic development, demolition of development, and removal of foundations and other components; portions of the Project Site that are currently vacant have been graded and/or plowed. The likely net effect of these actions, particularly in areas with little to no younger alluvium, would have been destruction or disturbance of any cultural resources that may have existed on the site, further reducing the prehistoric archaeological sensitivity of these areas. As described below under Impact 3.4-3, however, the City has engaged in consultations under AB 52 with Tribal representatives from the Gabrieleño Band of Mission Indians Kizh Nation in the area. During consultation, Tribal representatives expressed a concern that the Project Site vicinity has not been studied or observed during ground-disturbing activities, and according to the Tribe, could have sensitivity for prehistoric archaeological resources. Mitigation Measure 3.4-1, set forth below, incorporates the recommendations of Tribal representatives in light of these concerns. For further information concerning the consultation process, and the recommendations of Tribal representatives, please see the analysis under Impact 3.4-3.

Although the likelihood of encountering prehistoric and/or historic-period archaeological deposits is low, there remains the possibility that Project-related ground disturbance, which could extend to depths of 35 feet below ground disturbance, could encounter archaeological deposits that qualify as historical resources or unique archaeological resources. If such resources were encountered, the Proposed Project would have a **potentially significant impact** on those resources, which would be mitigated to a less-than-significant level through implementation of Mitigation Measure 3.4-1, presented below, which includes provisions for archaeological and Native American monitoring as a result of discussions with the Tribe regarding sensitivity of the Project Site.

Off-Site Resources

Historic Architectural Resources

The Proposed Project was analyzed to determine if it would result in a substantial adverse change to the integrity of adjacent or nearby historical resources. Currently, there are no National or California register-listed historic resources located adjacent to the Project Site. The Forum, located approximately 1-mile north, is the nearest listed historic resource to the Project Site. The Forum underwent a rehabilitation, was listed on the National Register and the California Register, and reopened in 2014. “Following the rehabilitation, The Forum retains significant character-defining features ... It retains integrity of location, design, setting, materials, workmanship, feeling, and association.”⁶⁶ The Forum has been listed on the National and California registers under Criterion

⁶⁶ National Register of Historic Places, 2014. National Register of Historic Places Registration Form, Forum, Los Angeles, CA. August 2014.

C/3, respectively, for its embodiment of the distinctive characteristics of a type, period, or method of construction and its representative work of a master. It was designed by Charles Luckman and Associates in the New Formalist architectural style. The Forum is a multi-purpose indoor arena built in 1966, which hosted its first event in 1967. The following character-defining features were identified in the National Register Nomination:

Exterior:

- Symmetrical façade
- Central location on an open site with high visibility from adjacent streets and properties
- Low profile landscaping
- Raised podium
- Concrete ramps and railings
- Sculptural columnar supports that form an arcade and covered passage at the exterior
- Smooth surfaces of the exterior concrete columns
- Original roof fascia profile
- Flat roof
- Suspension roof system
- Metal panel exterior walls set back from colonnade
- Four main entrances with multiple personnel doors
- Original ticket windows

Interior:

- The interior bowl spatial volume, including the elliptical seating rows, an elliptical cross aisle at the main concourse level, congruent elliptical wall at the lower event level, and the circular wall enclosure at the top
- Seating tier: risers and treads that form the lower and upper seating bowls
- Perforated metal wall cladding
- Vomitoria, truck tunnel, and other exit passages
- Two public concourses formed by an exterior circular wall and an interior elliptical seating cross aisle
- Passages from concourses to cross aisles
- Ceiling shape, texture, and light fixtures in the public concourses

The Forum is located outside of the Project Site approximately 1-mile north of West Century Boulevard along South Prairie Avenue. The Proposed Project would not involve the demolition, destruction, relocation, or alternation of the resource or its immediate surroundings. The

character-defining features that are associated with setting include landscaping surrounding The Forum and views of The Forum from adjacent streets and properties. However, the surrounding views of The Forum from beyond properties and streets adjacent to The Forum (for example, from the Project Site) are not character-defining features of the resource and alterations to the surrounding setting in the area of the Project Site would not affect the resource's integrity. Therefore, the development of the HPSP Adjusted Baseline projects under Adjusted Baseline Environmental Setting conditions would not affect the baseline for analysis of the historic resource. These features would be preserved and would not be materially altered in a manner as a result of the Proposed Project. The Project Site is approximately 1 mile away and is not considered to be the resource's immediate surroundings. For these reasons, views to or from The Forum from the Project Site would not be relevant in assessing potential Project-related impacts to The Forum. The Forum is currently visible from the Project Site, and these views will be obscured as a result of the HPSP Adjusted Baseline projects. However, the setting is fully urbanized, the distance between The Forum and the Project Site (approximately 1 mile) is too great to alter setting of The Forum, and the Proposed Project would not materially impair any of the character-defining features of The Forum. Altering the views to and from The Forum would not result in alterations to The Forum's integrity. The Forum would continue to retain all aspects of integrity and would remain eligible for listing in the National and California registers.

For the reasons described above, the Proposed Project effects on historical architectural resources would be **less than significant**.

Archaeological Resources

Archaeological resources are not evaluated for off-site impacts as they are typically underground or buried resources within the Project Site and would not be impacted indirectly by development of the Proposed Project.

For the reasons described above, this impact is considered **potentially significant**.

Mitigation Measure 3.4-1

Retention of Qualified Archaeologist. Prior to the start of ground-disturbing activities associated with the Proposed Project, including demolition, trenching, grading, and utility installation, the project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources.

- a) ***Monitoring and Mitigation Plan.** Prepare, design, and implement a monitoring and mitigation program for the Proposed Project. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Plan shall be prepared and approved prior to the issuance of the first grading permit.*

- b) **Cultural Resources Sensitivity Training.** *The qualified archaeologist and Native American Monitor shall conduct construction worker archaeological resources sensitivity training at the Proposed Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (i), for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Proposed Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.*
- c) **Archaeological and Native American Monitoring.** *The qualified archaeologist will oversee archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations such as grading, trenching, or any other excavation activity associated with the Proposed Project and as defined in the Monitoring and Mitigation Plan. If, after advanced notice, the Tribe declines, is unable, or does not respond to the notice, construction can proceed under supervision of the qualified archaeologist. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the quantity and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist and the Native American monitor.*
- d) *In the event of the discovery of any archaeological materials during implementation of the Proposed Project, all work shall immediately cease within 50-feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).*
- e) *If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.*
- f) *In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural*

Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.

- g) If the resource is identified as a Native American, the qualified archaeologist and project applicant shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered, to the extent feasible.*
- h) Prepare a final monitoring and mitigation report for submittal to the applicant, and the SCCIC, in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report which will be submitted to the SCCIC and the applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.*

Level of Significance After Mitigation: Mitigation Measure 3.4-1 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, the recommended Mitigation Measure 3.4-1 for the retention of a qualified archaeologist, cultural resources sensitivity training, and inadvertent discovery protocols is proposed to address potential impacts. With implementation of Mitigation Measure 3.4-1, the impact to any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be **less than significant**.

Impact 3.4-2: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5. (Less Than Significant with Mitigation)

Archaeological resources not qualifying as historical resources under CEQA are considered for their potential to qualify as unique archaeological resources. Review of previous investigations undertaken in the vicinity of the Project Site, as well as review of the prehistoric context for the area, provides an understanding of the potential for encountering prehistoric archaeological resources in the Project Site during construction. When completing analysis of subsurface archaeological sensitivity, important factors to consider include elevation, soil conditions,

proximity to water, proximity to raw materials, and ethnographic and historic information. It is also necessary to evaluate the historic land use and past development and disturbances on the Project Site in determining the possibility for the preservation of subsurface prehistoric archaeological materials.

As discussed above under Impact 3.4-1, no archaeological resources have been previously recorded within or adjacent to the Project Site; two archaeological resources consisting of one historic-period isolate (EAN-1) and one shell isolate of undetermined age (WSN-1) were identified within the Project Site during survey. Due to their isolate nature and lack of clear cultural context, EAN-1 and WSN-1 are not eligible for listing in the California Register and do not otherwise qualify as historical or unique archaeological resources pursuant to CEQA.

The geoarchaeological review indicates that much of the Project Site is underlain by Pleistocene-aged alluvium which has low potential for intact archaeological deposits. An area of Late Pleistocene to Holocene alluvium is mapped along South Doty Avenue between the Arena Site and the East Transportation and Hotel Site; the Late Pleistocene to Holocene alluvium has higher potential to contain buried archaeological deposits. Furthermore, the historic map and aerial photograph review indicates the Project Site was developed by the 1920s with residential subdivisions, which were largely replaced by commercial buildings sometime in the 1960s. As such, there may be historic-period archaeological deposits associated with the early residential development of the Project Site. Given the degree of disturbance within the Project Site, which has included the prior construction and demolition of residential and commercial buildings, prehistoric and/or historic-period archaeological deposits that may have underlain the Project Site could have been destroyed.

Although the likelihood of encountering prehistoric and/or historic-period archaeological deposits is low, there remains the possibility that Project-related ground disturbance, which could extend to depths of 35 feet below ground disturbance on the Arena Site, could encounter archaeological deposits that qualify as historical resources or unique archaeological resources, and would be considered a **potentially significant impact**.

Mitigation Measure 3.4-2

Implement Mitigation Measure 3.4-1.

Level of Significance After Mitigation: Mitigation Measure 3.4-2 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, the recommended Mitigation Measure 3.4-2 for the retention of a qualified archaeologist, cultural resources sensitivity training, archaeological and Native American monitoring and inadvertent discovery protocols is proposed to address potential impacts. With implementation of Mitigation Measure 3.4-2, the impact to any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be **less than significant**.

Impact 3.4-3: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k).**
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. (Less Than Significant with Mitigation)**

Tribal Consultation

The City has engaged in consultations with Native American Tribes pursuant to AB 52. Letters and other materials reflecting the City’s consultations with Native American Tribes and the NAHC are provided in Appendix F (detailed notes of conversations are confidential and on file with the City). The following discussion summarizes those consultations.

On February 12, 2018, the City submitted letters requesting consultation to five Native American individuals and organizations on the City’s AB 52 Notification List. As a result of this outreach, the City received letters via email from the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe) requesting formal consultation.

Through consultation the Tribe provided its knowledge of the Project Site and concerns about the Proposed Project. The site is located in the Tribe’s ancestral territory, and they consider the area around the Project Site to have a high sensitivity for finding cultural resources and human remains related to trade routes and village activity. The Tribe also stated that the Project Site is archaeologically sensitive. The Tribe did not identify any known Tribal cultural resources (as defined in PRC section 21074) within the Project Site. The Tribe provided a map, consistent with **Figure 3.4-1, 1937 Kirkman Map**, showing the nearest known Native American village sites and trade routes. None of the village sites or trade routes is located on the Project Site. The nearest village site or trade route is labeled “Old Salt Road.” This road is located approximately 2 miles to the west of the Project Site. The road curves to the north and east, and is located approximately

Figure 3.4-1 1937 Kirkman Map

2 miles to the north of the Project Site.⁶⁷ The Tribe also submitted images of four pages from an untitled report. These pages consist of reproductions of four historic hand drawn maps that include: “*Rancho del paso de las carreta*” (located approximately 5 miles northwest of the Project Site), “*Rancho Sausal Redondo*” (located approximately 4 miles north of the Project Site), a portion of the Kirkman map identifying the location of “*Guacha*” (located approximately 6 miles northwest of the Project Site), and the Johnston 1952 map depicting the villages “*Sa’angna*” (located approximately 5.5 miles northwest of the Project Site).^{68,69,70,71}

The Tribe further referenced a 1920 topographic map and the presence of the ephemeral drainage to the north of the Project Site. Additionally, the Tribe provided their recommended mitigation measures, and requested that the City (1) require sensitivity training; (2) have a Native American monitor on site to monitor ground disturbance activity; (3) provide the Tribe with an opportunity to review the EIR’s description of Tribal history; and (4) provide the opportunity to review proposed mitigation measures addressing Tribal resources. The City discussed proposed mitigation with Tribe throughout the consultation process, and in June of 2019 the City and the Tribe agreed upon the recommend mitigation for archaeological and Native American monitoring for ground disturbance as well as a provision that artifacts would be repatriated to the Tribe or reburied depending on the type of materials encountered. The City documented this mutual agreement in a close of consultation letter on July 15, 2019.

On May 16, 2019, the City met with Tribal representatives to discuss proposed mitigation measures addressing the potential presence of Tribal resources. The City stated that, as requested by the Tribe, recommended mitigation measures for archaeological and Tribal resources would include Native American monitoring during construction activities that involve ground disturbance. Tribal representatives stated that they were satisfied with this recommended mitigation measure. Tribal representatives also requested that the City add language to the recommended mitigation providing that that, if found, artifacts would be repatriated to the Tribe or reburied depending on the type of materials encountered. The Tribe further agreed that, once they concur with this request, consultations under AB 52 would be concluded. Recommended Mitigation Measure 3.4-1, as set forth above, has been revised to incorporate this request.

Analysis

The *Cultural Resources Assessment Report* includes a prehistoric and historical context of the Project Site and vicinity, and summarizes the Rancho period history of Inglewood. The report also includes a summary of the record search results, a land use analysis, and geoarchaeological

⁶⁷ George W. Kirkman, 1937. The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.–1937 A.D., 1887, Map on File: Map Room of the History Department, Los Angeles Public Library. Los Angeles, CA.

⁶⁸ California State Archives, n.d. Diseno for the Rancho Sausal Redondo.

⁶⁹ California State Archives, n.d. Location of Guacho on the 1839 diseno for the Rancho La Ballona.

⁷⁰ George W. Kirkman, 1937. The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.–1937 A.D., 1887, Map on File: Map Room of the History Department, Los Angeles Public Library. Los Angeles, CA.

⁷¹ Johnston, Bernice Eastman, 1962. *California’s Gabrielino Indians*. Southwest Museum. Los Angeles, California.

analysis of the Project Site. This information was analyzed to assess the sensitivity for cultural resources during ground disturbance.

The records search results indicate that four cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Of the four previous studies, two are adjacent to the Project Site along West Century Boulevard. None of the previous studies overlaps with the Project Site. The previous studies include a linear survey report that covers several communities for a pipeline alignment, and a memorandum from the Office of Historic Preservation regarding the section 106 process for the same project. The NAHC responded to the SLF request in a letter stating that the SLF search did not reveal the presence of Native American cultural resources within or adjacent to the Project Site.

Historic maps, including the Kirkman Map and other maps provided or referenced by the Tribe, were reviewed as part of the background research for the Proposed Project to identify historic land uses and the location of Native American villages in the historic era. The Kirkman map is identified by the Tribe as a source providing the locations of Gabrielino village sites and trails, or old roads that followed aboriginal trails throughout Los Angeles County. To accurately determine the location of the Project Site on the Kirkman map, this map was georeferenced in GIS to Los Angeles County boundaries (see Figure 3.4-1). The georeferencing is based off of three control points throughout the County including: the southwest corner near Malibu, California; the northwest corner near Gorman, California; and northeast corner near Kramer Junction, California. Georeferencing the map reflected changes in the boundaries of Los Angeles County from the boundary that existed in 1937, at the time the Kirkman map was prepared. At this referenced scale, the Kirkman map does not show any roads, villages, trails, landforms, or locations overlapping with the Project Site. The map does show a dot which is noted as “(Inglewood) *Aguaje de la Centinela*” approximately 2 miles to the northwest of the Project Site. This location is generally consistent with the location of the Centinela Adobe, which was and still is located near the banks of the Centinela Creek. Over 2 miles to the south of the Project Site the City of “(Hawthorne)” is also indicated on the map. There are no trails or old roads depicted on the Kirkman map in the vicinity of the Project Site, the nearest route is over 2 miles to the west and is labeled “Old Salt Road”; this feature curves around to the north of the Project Site continuing east at a distance of over 2 miles to the north of the Project Site. These are the closest locations of Gabrielino village sites, old roads, or possible trails, to the Project Site as indicated on the Kirkman map.

During consultations, the Tribe stated that Centinela Springs represented a significant source of water for Tribes in the area and, as a result, Tribal resources might be located there. The Kirkman map does not show the location of such a resource; however, the Centinela Springs are commemorated with a plaque at their former location. The plaque is located in a park 2 miles to the north of the Project Site. The nearest Gabrielino villages that are depicted on the Kirkman map are located near the Baldwin Hills (approximately 3 miles north) and toward the Ballona Wetlands (approximately 4 miles northwest).

The four historic hand drawn maps provided by the Tribe include one entitled “*Rancho del paso de las carretas*,” which is a hand drawing showing the location of the village of *Guacho* on a map of the *Rancho La Ballona*. The *Ballona* land grant (or rancho) is approximately 4.87 miles to the northwest of the Project Site, just to the north of the *Sausan Redondo* land grant.

The second hand drawn map is of the *Rancho Sausal Redondo*. The *Rancho Sausal Redondo*’s boundaries end at West Century Boulevard to the north of the Project Site, and South Prairie Avenue to the west of the Project Site, and continue to extend northwest over 4 miles to just south of Jefferson Boulevard. This map is also depicted in McCawley⁷² who describes the map as a “Map of *Rancho Sausal Redondo* showing the Mexican land grant of *Guaspita* located on the east bank of Ballona Creek.” *Guaspita* is depicted on the map a short distance from the coast on the hill overlooking Ballona Creek, which is located approximately 5 miles to the northwest of the Project Site. The third hand drawn map is a portion of the Kirkman⁷³ map which calls out the location of *Guacha*, which is again depicted near Playa del Rey near the banks of the Ballona Creek. The final hand drawn map is cited as “Johnston 1962” which depicts geographical features and known Gabrielino villages at the time of the Portola Expedition. The map depicts a village called *Sa’angna* just to the south of the Ballona Creek, northwest of the Project Site; the map does not depict any labeled villages in, or within the immediate vicinity of, the Project Site. McCawley indicates that *Sa’angna* was a Gabrielino village located near the banks of the Ballona, over 5 miles from the Project Site.

On March 21, 2018, the Tribe submitted another document entitled “Cultural Resources Mitigation Measures, regarding Tribal Cultural Resources and Human Remains and associated funerary objects within Kizh Gabrieleño Tribal Territory.” This document provides recommendations for project applicants to follow during project construction, which include the retention of a qualified Native American Monitor during construction related ground disturbance, unanticipated discovery of Tribal cultural resources mitigation, unanticipated discovery of human remains and associated funerary objects mitigation, as well as professional standards descriptions.

As described above, the materials submitted by the Tribe provided information regarding the Project Site and vicinity as discussed during the meetings between the City and the Tribe on March 21, 2018, and March 20, 2019. The maps provided are historic maps of Gabrielino village locations throughout Los Angeles County, as well as hand drawn maps of two ranchos which were established to the north and west of the Project Site. The historic documentation provided by the Tribe has been included as context in the *Cultural Resources Assessment Report* and considered for this analysis.

The determination that the Project Site itself has low sensitivity for archaeological resources is based on many factors described in this section. In addition, the maps provided by the Tribe do not indicate the presence of any known village sites within the Project Site or the immediate

⁷² McCawley, William, 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning, California pp. 62-63.

⁷³ George W. Kirkman, 1937. *The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.–1937 A.D.*, 1887, Map on File: Map Room of the History Department, Los Angeles Public Library. Los Angeles, CA.

vicinity. The historic maps, the geoarchaeological analysis, and the land use history, were all used to determine the proximity of a sustainable source of water and other natural resources such as wetlands that may be indicators of prehistoric habitation. The materials studied did not indicate that such resources existed at, or in the immediate vicinity of, the Project Site. Although evidence was provided by the Tribe that indicates the location of villages and known archaeological sites, none of these resources is located within 2 miles of the Project Site (i.e., all are 2 to 5 miles away). The locations of these villages and archaeological sites are close to known trade routes and old roads known to have been used by prehistoric and early historic era peoples to travel from the inland to the coast. There are no such trade routes, old roads, or known villages documented within 2 miles of the Project Site. In the course of the City's investigation, including information obtained through consultations with the Tribe, the City has not obtained evidence that sacred lands or Tribal cultural resources overlap with or occur within the Project Site. The City, having reviewed the information provided by the Tribe, concludes that the Project Site does not contain any previously known Tribal cultural resources, and that the Project Site has a low sensitivity for buried archaeological resources that, if encountered, could potentially be considered a Tribal cultural resource as defined in PRC section 21074, 5020.1(k), or 5024.1.

Based on all available information, including the information provided by the Tribe during consultations, the City does not have evidence of known Tribal cultural resources as defined in PRC section 21074(a)(1) that are listed or eligible for listing in the California Register, or in a local register of historical resources as defined in PRC section 5020.1 (k), or that are determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to PRC section 5024.1, within the Project Site. The Tribe provided information to the City during the consultation process under AB 52. This information indicates that sites that are likely to contain sensitive resources due to their importance to the Tribe are located 2 miles or more from the Project Site.

As described above, no sensitive Tribal cultural resources have been found on or near the Project Site. The single shell identified during survey (WSN-1) is likely related to historic subsistence practices at the site; however, should similar resources be encountered during construction the qualified archaeologist would evaluate the find as described in Mitigation Measure 3.4-1. While there is no identified Tribal cultural resource on the Project Site, there is potential that subsurface archaeological resources may be encountered during ground disturbing activity. Given the sensitivity of the Project Site, previously unknown archaeological resources identified during ground disturbing activities could be determined by the Tribe to be a potential Tribal cultural resource. If not treated properly, ground disturbing activities therefore could cause a substantial adverse change in the significance of a known Tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and would be considered a **potentially significant impact**.

Mitigation Measure 3.4-3

Implement Mitigation Measure 3.4-1.

Level of Significance After Mitigation: As documented in the July 15, 2019, letter closing Tribal consultation, the City and the Tribe are in mutual agreement that the Proposed Project would not result in potentially significant impacts to Tribal cultural resources with implementation of Mitigation Measure 3.4-3. Mitigation Measure 3.4-3 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated tribal cultural resources are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. With implementation of Mitigation Measure 3.4-3, the impact to any unanticipated Tribal cultural resources would be **less than significant**.

Impact 3.4-4: Construction of the Proposed Project could have the potential to disturb human remains including those interred outside of dedicated cemeteries. (Less Than Significant with Mitigation)

No human remains were identified during the pedestrian survey of the Project Site and no known human remains have been recorded within the Project Site or a 0.50-mile radius. The overall sensitivity of the Project Site with respect to archaeological resources, including human remains, is low. Project-associated grading and excavation would extend into previously undisturbed subsurface areas or other locations where there is some possibility to encounter buried human remains. As a result, although unlikely, construction may disturb human remains, including those interred outside of dedicated cemeteries, which would be a **potentially significant impact**.

Mitigation Measure 3.4-4

Inadvertent Discovery of Human Remains. In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the Proposed Project, all work shall immediately cease within 100 feet of the discovery and the County Coroner shall be contacted in accordance with PRC section 5097.98 and Health and Safety Code section 7050.5. The project applicant shall also be notified. If the County Coroner determines that the remains are Native American, the California Native American Heritage Commission (NAHC) shall be notified in accordance with Health and Safety Code section 7050.5, subdivision (c), and PRC section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendant (MLD) for the remains per PRC section 5097.98. Until the landowner has conferred with the MLD, the project applicant shall ensure that a 50-foot radius around where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

Level of Significance After Mitigation: Mitigation Measure 3.4-4 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a proscribed protocol for their disposition in accordance with applicable regulations, notification of the NAHC, and subsequent Tribal coordination if remains are determined to be of Native American descent. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of PRC section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall

inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. Thus, the impact would be considered **less than significant**.

Cumulative Impacts

The cumulative setting for cultural, archaeological, and Tribal resources varies by resource type, as is described below. The Project Site, in the southwestern portion of the fully urbanized City of Inglewood, is surrounded by residential and commercial development to the west, south, and east. The HPSP area is located to the north. Part of the HPSP Adjusted Baseline projects that are currently under development will result in new commercial, office, residential, parking, open space, and NFL Stadium uses. Prior to the development of the Project Site and vicinity, historic topographic maps indicate a north-south trending ephemeral drainage originating north from the Baldwin Hills and extending to the East Transportation and Hotel Site. The area is within the ethnographic territory of the Gabrielino Tribe. Geologically, the Project Site is situated within the West Coast Basin portion of the greater Los Angeles Basin, a broad trough formed by tectonic activity and stream erosion of nearby mountains, and filled with Quaternary-aged terrestrial and shallow marine sediments overlying Tertiary-aged marine sediments.

In addition to the Proposed Project, there are 145 projects that have been taken into consideration when developing the cumulative context, although the context varies by resource type. The closest cumulative project (Cumulative Project No. 67) is the proposed development associated with the development of the HPSP area, located immediately to the north of the Arena Site. As noted above, the HPSP Adjusted Baseline projects are currently under construction, and are considered in the project-level analysis above.

Impact 3.4-5: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to result in cumulatively considerable impacts to historical resources. (Less Than Significant with Mitigation)

A cumulative impacts analysis for historic architectural resources evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts on historical resources. If these projects would result in a significant impact, then the Proposed Project's contribution would need to be determined. The cumulative context for historic resources can be defined by a number of factors depending on the conditions and the presence or absence of known historic resources in the area. For the Proposed Project the cumulative context for historical resources considers impacts to significant historical resources in Inglewood. There are 33 cumulative projects in the City of Inglewood, with the HPSP project being the only one in the immediate vicinity of the Project Site. The majority of the 33 projects are residential developments, many of which are small scale, while the HPSP accounts for a large portion of the cumulative development. The HPSP EIR was certified in 2009 and concluded that the HPSP project would result in a less-than-significant impact to historic resources. Given the long history of Inglewood and large number of historic-age buildings and structures throughout the City it is

possible that historical resources may be significantly impacted as a result of at least one of the 33 projects that constitute the cumulative context. Therefore, the cumulative impact on historic architectural resources would be potentially significant.

As discussed above, although the likelihood of encountering prehistoric and/or historic-period archaeological deposits is low, there remains the possibility that Project-related ground disturbance, which could extend to depths of 35 feet below ground disturbance, could encounter archaeological deposits that qualify as historical resources or unique archaeological resources. If such resources were encountered, the Proposed Project would have a potentially significant impact on those resources. Given the proximity of other cumulative projects and the sensitivity for encountering such resources, the Proposed Project could contribute to cumulative impacts. Based on the above considerations, the Proposed Project, in conjunction with cumulative development within the project vicinity, implementation of the Proposed Project could result in cumulatively considerable impacts to historical resources. Therefore, the cumulative impact would be **potentially significant**.

Mitigation Measure 3.4-5

Implement Mitigation Measure 3.4-1.

Level of Significance After Mitigation: Mitigation Measure 3.4-5 would ensure that archaeological monitoring would discover unanticipated archaeological resources that qualify as historical resources, during construction, that will be identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant project-level impacts on archaeological resources that are historical resources under CEQA. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact on archaeological resources and would be considered **less than significant**.

Impact 3.4-6: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on archaeological resources. (Less than Significant with Mitigation)

The cumulative context for archaeological resources, which may also be historical resources under CEQA, is within 0.5 miles of the Project Site, which includes areas within the fully urbanized City of Inglewood and other urbanized areas. Within these areas, the context has been defined by the known archaeological resources or level of archaeological sensitivity in the area. The site and its vicinity were developed around the turn of the century, and there are no known historic archaeological sites within a 0.5 miles of the Project Site. However, unknown, subsurface, historic or archaeological resources, some of which may be historical resources under CEQA, could be preserved under the surface of vacant land or under the current development. As such, development in these areas could have a potentially significant cumulative impact to archaeological resources. While the Project Site is not known to contain archaeological resources, it is possible that the Project Site could contain previously undiscovered archaeological resources.

The Proposed Project could have a cumulatively considerable contribution to the loss of archaeological resources, and the impact would be **potentially significant**.

Mitigation Measure 3.4-6

Implement Mitigation Measure 3.4-1.

Level of Significance After Mitigation: Mitigation Measure 3.4-6 would ensure that archaeological monitoring would discover unanticipated archaeological resources, during construction, that will be identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant project-level impacts on archaeological resources that are historical resources under CEQA. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact on archaeological resources and would be considered **less than significant**.

Impact 3.4-7: Construction of the Proposed Project, in conjunction with construction of other cumulative development, could have the potential to contribute to cumulative impacts on the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074. (Less than Significant with Mitigation)

The cumulative context for Tribal cultural resources is within the Gabrielino Tribal territory which encompasses land within Los Angeles County north to Thousand Oaks, east to Pomona, west to the coast and south to Long Beach. Their territory also extends into Orange County as far south as Costa Mesa. The City is included within the Gabrielino Tribal territory and has been subject to historic development within the City since the rancho period, with more wide scale development occurring at the turn of the century. The Gabrielino Tribal territory has been subject to wide scale development and redevelopment projects over the past several decades and is currently experiencing a high level of redevelopment projects. Known Tribal village locations, trade routes, and known significant prehistoric archaeological sites that have a higher potential to represent a Tribal cultural resource are mapped and documented between 2 and 5 miles from the Project Site. As such, development in these areas could have a significant impact to a Tribal cultural resource. Cumulatively, the large amount of development within the Tribal territory, especially development within known village locations, trade routes, and known significant prehistoric archaeological sites could have significant and unavoidable impacts to Tribal cultural resources. All related projects would, like the Proposed Project, be required to comply with regulatory requirements governing Tribal cultural resources, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified the related projects would be required to comply with PRC section 21084.3, which would require avoidance and preservation or mitigation as defined in PRC section 21084.3(b).

As described above, the Proposed Project could result in a significant impact on a previously unknown Tribal cultural resource. While there are no Tribal cultural resources identified within the Project Site, the City has consulted with Tribal representatives and recognizes the potential sensitivity. Based on the above considerations, the Proposed Project, in conjunction with

cumulative development within the project vicinity and in the City, could result in cumulatively considerable impacts to Tribal cultural resources. Therefore, the cumulative impact would be **potentially significant**.

Mitigation Measure 3.4-7

Implement Mitigation Measure 3.4-1.

Level of Significance After Mitigation: As documented in the July 15, 2019, letter closing Tribal consultation, the City and the Tribe are in mutual agreement that the Proposed Project would not result in potentially significant impacts to Tribal cultural resources with implementation of Mitigation Measure 3.4-7. Mitigation Measure 3.4-7 would avoid and/or substantially lessen the above impact by ensuring that any unanticipated Tribal cultural resources are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact to any unanticipated Tribal cultural resources and would be considered **less than significant**.

Impact 3.4-8: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on human remains including those interred outside of dedicated cemeteries. (Less than Significant with Mitigation)

The cumulative context for the discovery of human remains is 0.5 miles. This area was developed since the rancho period with more wide scale development occurring historically around the turn of the century. Based on the SLF search and sensitivity analysis for cultural resources, there are no known burial grounds or unmarked cemeteries in, or within a 0.5-mile radius of the Project Site, and the overall sensitivity of the area, with respect to human remains, is low. The Project Site and surrounding 0.5-mile radius is more than 1.5 miles from the nearest known village sites or known prehistoric archaeological sites. There is a lack of year round water resources in the project vicinity that makes the presence of prehistoric resources including human remains unlikely.

During the rancho period, the settlers resided near Centinela Creek, over 2 miles north of the Project Site. The likelihood of unmarked graves associated with the Rancho period is low as the preference would have been to bury family members at the Mission or in the Pueblo near the church. The site and vicinity were developed around the turn of the century, at which time (i.e., in 1905) the Inglewood Park Cemetery was established. The cemetery is still in operation and located 1.5 miles to the north of the Project Site, and outside of the cumulative context established for human remains. Because the cemetery was close by, available, and in use, the likelihood of unmarked historic-age graves in the 0.5-mile radius of the Project Site is low. However, due to the current development and disturbance in the cumulative context area, it is not currently possible to identify any sites or resources that may exist subsurface. Any disturbance of

potential subsurface human remains as a result of cumulative development would be a potentially significant cumulative impact on human remains.

The Project Site is not known to contain any unmarked graves or human remains. However, the loss of any previously unknown human remains would be significant, and the Proposed Project would have a considerable contribution to a significant impact. Therefore, the cumulative impact to human remains is **potentially significant**.

Mitigation Measure 3.4-8

Implement Mitigation Measure 3.4-4.

Level of Significance After Mitigation: Implementation of Mitigation Measure 3.4-8 would ensure that all work immediately cease within 100 feet of the discovery, all relevant PRC and Health and Safety Codes that pertain to human remains discovery are followed, and the identified appropriate actions have taken place. Therefore, with mitigation, the Proposed Project would not have a considerable contribution to a cumulative impact on human remains and would be considered **less than significant**.